



SIERRA CLUB

September 14, 2020

Via electronic delivery

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges
Docket No. 2020-125-E
Sierra Club's Second Set of Data Requests

Dear Ms. Boyd,

On behalf of Robert Guild, please find enclosed for filing in the above-referenced case Sierra Club's second set of data requests. This request was filed today via the South Carolina Public Service Commission Case E-Filing System. As indicated on the Certificate of Service, I am serving all parties of record via electronic mail.

Please contact me with any questions.

Sincerely,



on behalf of

Robert Guild
S.C. Bar No. 2358
314 Pall Mall Street
Columbia, SC 29201
(803) 916-5738
bguild@mindspring.com

Enclosure

cc: Certificate of Service

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E

In re:

Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges (See Commission Order No.2020-313)

**SIERRA CLUB’S SECOND SET
OF DATA REQUESTS
September 14, 2020**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
(i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to the current COVID-19 situation and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild
bguild@mindspring.com

Dorothy E. Jaffe
dori.jaffe@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications,

any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
 - a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means Dominion Energy South Carolina and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion Energy South Carolina.

DATA REQUESTS

Request No. 2-1. For Cope Station, please identify the amount of money that the Company has included in its Test Period spending as proposed in this case, by the following types:

- a. Fixed operations and maintenance;
- b. Variable operations and maintenance;
- c. Capital;
- d. Fuel; and
- e. Other.

Request No. 2-2. For Cope Station, please provide all documents that were relied on by the Company to calculate costs included in its Test Period estimate, including, without limitation, any:

- a. Maintenance schedules;
- b. Maintenance plans;
- c. Fuel contracts;
- d. Fuel cost forecasts; and
- e. Estimates of major capital expenses

Request No. 2-3. For each Test Period capital expenditure at Cope Station, please:

- a. Describe the reason for the expenditure.
- b. Identify whether the expenditure would be necessary if the plant were to retire prior to 2023. If the expenditure would still be necessary, explain why.
- c. Identify whether the expenditure would be necessary if the plant were to retire prior to 2025. If the expenditure would still be necessary, explain why.

- d. Identify whether the expenditure would be necessary if the plant were to retire prior to 2030. If the expenditure would still be necessary, explain why.

Request No. 2-4. For Cope Station, has the Company conducted any analyses of the economic viability, prudence, and/or net present value revenue requirements for customers of continuing to operate the unit?

- a. If not, please explain why not.
- b. If so, please identify the date and nature of each analysis.
- c. Please provide all reports or other documentation of the results of each analysis listed in response to subpart (b), and any supporting calculations, data, documents, modeling input and output files, and workpapers associated with each such analysis.

Request No. 2-5. For Cope Station:

- a. Please produce any unit replacement studies conducted by or for the Company.
- b. Identify any transmission grid updates or changes that would be needed to allow for the retirement of any of these units.
- c. Produce any analysis or assessment of the need for the continue operations of each unit.
- d. Provide the remaining book value (plant balance) at the start of 2019.
- e. Identify the current undepreciated book value and the expected undepreciated book value for each year of the remaining operation life of each unit.
- f. Produce any analysis or assessment of the impact that retirement of each unit would have on capacity adequacy, transmission grid stability, transmission grid support, voltage support, or transmission system reliability.

Request No. 2-6. For Cope Station, please identify and produce:

- a. The most recent assessment of the condition and/or remaining life of the plant; and
- b. Any analysis or assessment conducted since 2015, of the economics of continued operation of the unit, i.e., a disposition/retirement study.

Request No. 2-7. For Cope Station:

- a. Confirm that the Company owns 100% of the unit. If denied, identify the Company's ownership share of any co-owned unit(s); and the name of the current co-owners and their ownership percentages.
- b. Identify the estimated retirement date.
- c. Explain the basis for each retirement date that is identified.
- d. Please provide all supporting analyses, calculations, data, documents, modeling input and output files, and workpapers associated with or used in determining each retirement date.

Request No. 2-8. For Cope Station, please provide the following earliest available historical annual data:

- a. Installed capacity;
- b. Unforced capacity;
- c. Capacity factor;
- d. Availability;
- e. Heat rate;
- f. Forced or random outage rate;
- g. Fixed O&M;
- h. Non-fuel variable O&M;

- i. Fuel costs;
- j. Environmental capital costs;
- k. Non-environmental capital cost;
- l. Energy revenues;
- m. Capacity revenues;
- n. Ancillary services revenues;
- o. Any other revenues;
- p. Depreciation;
- q. Undepreciated net book value;
- r. Property taxes;
- s. Property insurance; and
- t. Projected retirement date, if any.

Request No. 2-9. For Cope Station, please provide (1) hourly and (2) daily capacity factors (or energy production in MWh), from earliest available through the most recent time for which data are available. If those figures are not available, please confirm that, and then provide the requested data at the most granular unit of time available.

Request No. 2-10. For Cope Station, for each of the years 2019 through 2033, please identify the following for all resource plans identified in the Company's 2020 Integrated Resource Plan:

- a. Installed capacity;
- b. Unforced capacity;
- c. Capacity factor;
- d. Availability;
- e. Heat rate;

- f. Forced or random outage rate;
- g. Fixed O&M;
- h. Non-fuel variable O&M;
- i. Fuel costs;
- j. Environmental capital costs;
- k. Non-environmental capital cost;
- l. Energy revenues;
- m. Capacity revenues;
- n. Ancillary services revenues;
- o. Any other revenues;
- p. Depreciation;
- q. Undepreciated net book value;
- r. Property taxes;
- s. Property insurance; and
- t. Projected retirement date, if any.

Request No. 2-11. Has the Company evaluated whether Cope Station will require additional investments to comply with final, proposed, or possible future environmental regulations including, but not limited to: existing consent decrees, new source review provisions, coal combustion residuals, effluent limitation guidelines, national ambient air quality standards, cooling water intake standards, the cross-state air pollution rule, the mercury and air toxics standards, regional haze, and carbon dioxide emissions?

- a. If not, please explain why not.

- b. If so, please provide a summary, organized by electric generating unit, briefly describing the additional investments, including the purpose, and capital and annual O&M costs of such investments.
- c. Please also include all supporting analyses, calculations, data, documents, modeling input and output files, and workpapers associated with each investment.

Request No. 2-12. Provide any internal planning documents or spreadsheets that discuss the Company's plans or options for early retirement of Cope Station.

Request No. 2-13. For Cope Station, provide the following information:

- a. Minimum down time
- b. Minimum up time
- c. Time from shut down to first power generation
- d. Ramp rates up and down

Request No. 2-14. For Cope Station, please provide the time frame over which the Company evaluates whether a unit's commitment decision maximizes a unit's economic value to customers.

Request No. 2-15. Has the Company conducted any analysis on switching Cope Station to seasonal operations?


- a. If so, provide all such analyses in native, machine readable format.
- b. If not, please describe the extent to which the Company has considered such a switch
- c. If the Company has not considered a switch to seasonal operation, please explain, in detail, why.

Request No. 2-16. Regarding the Company's unit commitment decision process for Cope Station:

- a. Describe the Company's process for determining when to commit the coal units and operate them up to at least their minimum operation levels.
- b. Does the Company perform economic analyses to inform its unit commitment decisions?
 - i. If no, explain why not.
 - ii. If so, provide all such analyses conducted since 2015 in native, machine-readable format.

Request No. 2-17. Please provide all documents related to discussions within the Company or with other utilities, such as Santee Cooper, on building a combined cycle power plant.

Respectfully submitted this 14th day of September, 2020.



on behalf of
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**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South
Carolina, Incorporated for Adjustment
of Rates and Charges (See Commission
Order No.2020-313)

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-125-E, listed below, a copy of the Sierra Club's Second Set of Data Requests via electronic mail on this day, September 14, 2020.

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On behalf of

Robert Guild